



50 Oliver Street  
Suite 201a  
Easton, MA 02356

August 5, 2013

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus,  
MB

Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)

Dear Commissioners:

Easton Community Access Television submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Easton Community Access Television is a community media center in Easton, MA. We broadcast to just over 7200 cable subscribers on 2 channels. We are fortunate to have two MVPDs (Comcast and Verizon) but neither of them, since our cablecast began in 2010 include any programming information.

One of our most consistent complaints is the inability of viewers to understand what is on our channel via an on-screen program guide. Such a program guide is also the only source for information about potentially closed captioned programming. Captioning programming can be an expensive endeavor, and our facility is exempted via hardship clauses from mandated captioning.

Closed captioning is an accessibility issue that we are addressing moving forward. Our efforts will remain unrewarded and our community will remain unserved if the cable provider is not

required to pass along captioning information, listed in specific program information in their on-screen interactive program guides.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast and Verizon's program guide lists only a generic label of what our channel is, and no details regarding specific programs, despite our ability to deliver this information in detail to them. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010.

We have regularly requested that our MVPD's provide this service to the citizens of our community, but they have refused. Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible.

Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices. We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options .

Thank you for the opportunity to submit these comments.

Urgently,

Jason Daniels  
Easton Community Access Television, Director  
50 Oliver Street  
Suite 201a  
Easton, MA 02356